February 14, 1992

MEMORANDUM

Re: OSHA RFI Filings: Period from 1/22/92 to 1/23/92

The following comments were filed with OSHA between 1/22/92 and 1/23/92 in response to the Request for Information on Indoor Air Pollutants:

1. Mr. James L. Farmer, President, Greater Boston Labor Council, AFL-CIO, Roslindale, Massachusetts. Mr. Farmer submitted a one-paged letter supporting regulation of indoor air quality. He did not discuss ETS.

2. Mr. Joseph E. Beasley, Business Manager and General Vice President, International Union of Operation Engineers, Monroeville, Pennsylvania. Mr. Beasley submitted a two-paged letter encouraging OSHA to adopt ventilation standards. He did not discuss ETS.

3. Mr. Kirk A. Profit, Michigan House of Representatives, Lansing, Michigan. Mr. Profit, a State Representative from Michigan, submitted a one-paged letter encouraging OSHA to adopt a practical approach to indoor air quality "that addresses all indoor pollutants and does not single out one minor source, such as tobacco smoke, for undue attention at the expense of real improvements in indoor air quality." He also attached a petition signed by twenty-four individuals urging OSHA to reject efforts to impose smoking bans in the workplace.

4. Mr. Paul Dufault, Secretary-Treasurer, Local 1445 AFL-CIO, Boston, Massachusetts. Mr. Dufault submitted a two-paged letter encouraging OSHA to adopt ventilation standards. He did not discuss ETS.

5. Ms. Barbara Gronemus, State Representative - 91st Assembly, Madison, Wisconsin. Ms. Gronemus, a State Representative from Wisconsin, submitted a one-paged letter noting that "tobacco smoke is a very minor element of indoor pollutants and the emphasis on it has created situations where real improvements in indoor air quality have been ignored." She added that "minor cost effective adjustments in ventilation systems could alleviate the majority of indoor air quality concerns."

6. Mr. John J. Brittle, Business Manager, Sheet Metal Workers' International Association, North Miami Beach, Florida. Mr. Brittle submitted a two-paged letter urging OSHA to adopt ventilation standards. He did not discuss ETS.

2026099050

2026099050

Source: https://www.industrydocuments.ucsf.edu/docs/stgb0003

7. Mr. Norman Hill, National President, A. Phillip Randolph Institute (APRI), Washington, D.C. Mr. Hill, writing on behalf of APRI (a labor organization for black trade unionists), submitted a two-paged letter encouraging OSHA to adopt ventilation standards and discussing indoor air quality problems faced by members of his organization. He did not discuss ETS.

8. Mr. Samuel E. Cook, P.E., C.S.P., C.I.H., San Antonio, Texas. Mr. Cook, who has performed indoor air and industrial hygiene surveys for the last fifteen years, submitted a one-paged letter asserting that, if OSHA issues an indoor air quality standard that includes "maximum levels of air contaminants for indoor air that are different from * * * Permissible Exposure Limits" set by OSHA for industrial workplaces, such a standard could be challenged on equal protection grounds. He did not discuss ETS.

9. Mr. Joe D. Gunn, President, Texas AFL-CIO, Texas. Mr. Gunn submitted a one-paged letter encouraging OSHA to adopt standards "that will safeguard the office environment for millions of American office workers." He did not discuss ETS.

10. Mr. Richard A. La Dieu, President, American Federation of Government Employees (AFGE) Local 1812, AFL-CIO, Washington, D.C. Mr. La Dieu submitted a four-paged letter asserting that members of his organization "have suffered a wide range of problems, from headaches, fatigue and respiratory ailments to symptoms of adult asthma and upper respiratory problems" from working in buildings with inadequate ventilation. He also described his organization's efforts to improve indoor air quality in the workplace, and urged OSHA to adopt minimum ventilation standards "to protect federal, as well as public and private employees." Mr. La Dieu did not discuss ETS.

11. Mr. Thomas E. Glavinich, D.E., P.E., Shawnee, Kansas. Mr. Glavinich submitted a one-paged cover letter and comments providing "data and information regarding studies that have been performed which address ventilation rates, controls and systems." He did not discuss ETS.

12. Mr. M. R. Guerin, Analytical Chemistry, Oak Ridge National Laboratory, Oak Ridge, Tennessee. Mr. Guerin submitted a one-paged cover letter and pre-publication copies of an article entitled The Chemistry of Tobacco Smoke: Composition and Measurement, the preparation of which was supported by the Center for Indoor Air Research. This article focuses on the alleged contribution of ETS to indoor air contamination

2026099051

Source: https://www.industrydocuments.ucsf.edu/docs/stgb0003

in natural environments, and asserts that "the degree to which ETS exposure represents a health hazard remains a point of contention. This is in part because it is difficult to quantitate [sic] the excess exposure due solely to tobacco smoking in environments most frequently encountered by the general population * * * The assessment of public health impact is further complicated by the uncertain relative importance of a chronic exposure to slightly elevated concentrations of ETS constituents versus periodic exposure to clearly elevated concentrations of those constituents." The article adds that "the contribution of ETS to the concentration of indoor air contaminants in commonly encountered environments is much less than is implied by the extreme values included in many tabulations of [the observed] ranges "of concentrations at which individual constituents of ETS may occur in indoor air."

13. Ms. Elizabeth A. Cunningham, C.I.H., Eagle Environmental Health, Inc., Houston, Texas. Ms. Cunningham submitted a one-paged cover letter and comments evaluating "the significance of factors determining indoor air quality in buildings that enforce no-smoking policies." According to these comments, "assuring the correct design and operation of a building's ventilation system is overwhelmingly the most significant factor in assuring an acceptable indoor environment [since p]roblems with the ventilation system are responsible for 50-70% of the poor indoor air quality conditions." Although the comments added that "of secondary importance is control of indoor air contaminants * * * found in indoor air [which may include]" ETS, they did not specifically address ETS because it was "outside the scope of this investigation." In addition, Ms. Cunningham enclosed copies of articles which were reviewed in preparation for the comments. Some of these articles dealt with ventilation requirements in occupied spaces during smoking and nonsmoking occupancy, along with the alleged risks of radon exposure and how these risk estimates are affected "by smoking, and by traits in smoking habits."

In addition to the comments summarized above, four individuals submitted letters opposing smoking bans. Numerous petitions urging OSHA not to ban smoking in the workplace were also filed. These petitions were submitted partly in response to letters from the American Smokers Alliance (ASA) to its members alerting them to the efforts by anti-smokers to "ban smoking in virtually all public places" by encouraging OSHA to adopt anti-smoking regulations.

2026099052

2026099052

Source: https://www.industrydocuments.ucsf.edu/docs/stgb0003